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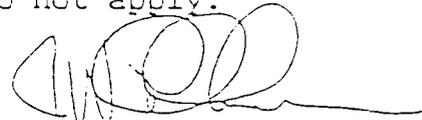
From: Commander, Eighth Coast Guard District
To: Distribution

Subj: STCW APPLICABILITY TO MODUS

Ref: (a) International Convention on Standards of Training,
Certificating and Watchkeeping (STCW), 1978

1. Enclosures (1) through (4), which discuss the applicability of the STCW to MODUs, are forwarded for your information.

2. In accordance with Article III of the subject convention, a non-self-propelled MODU does not meet the definition of a ship and therefore STCW requirements do not apply.



J. W. CALHOUN
Ex direction

Encl: (1) COMDT (G-MSO-1) ltr 16712/9 of 4 Nov 96
(2) International Registries, Inc ltr of 15 Nov 96
(3) Vanuatu Maritime Services, Ltd ltr of 21 Nov 96
(4) Republic of Panama, Directorate of Consular and
Maritime Affairs ltr of 11 Dec 96

Dist: All Eighth District Gulf Region MSOs, MSU and MSDs

United States
Coast Guard

16712/9

NOV 4 1996

Mr. Alan Spackman
Director, Offshore Technical and Regulatory Affairs
International Association of Drilling Contractors
P.O. Box 4287
Houston, TX 77210-4287

Dear Mr. Spackman:

This is in response to your letter dated October 18, 1996, regarding the applicability of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW) to non-self-propelled vessels. The STCW Convention applies to seafarers serving on board seagoing ships. In the context of this Convention, we have always considered the traditional definition of the term "ship" to be a self-propelled vessel. Therefore, non-self-propelled mobile offshore drilling units (MODUs) would fall outside the scope of STCW and the personnel serving on board such vessels would not be required to comply with its requirements.

We hope this clarifies this matter for you. Should you have further questions or require additional information, please contact CDR Greg Jones of my staff at the above number.

Sincerely,


R. L. SKEWES
Captain, U.S. Coast Guard
Office of Operating and
Environmental Standards
By direction of the Commandant

INTERNATIONAL REGISTRAR, INC.

11495 COMMERCE PARK DRIVE
RESTON, VIRGINIA 22091
TELEPHONE: (703) 620-4880
TELEFAX: (703) 476-8522

TOWER 49
12 EAST 49th STREET
NEW YORK, NY 10017
TELEPHONE: (212) 486
TELEFAX: (212) 486-5311

November, 15, 1996

Mr. Alan Spackman
Director, Offshore Technical and
Regulatory Affairs
International Association
of Drilling Contractors
P.O. Box 4287
Houston, Texas 77210-4287

Re: Applicability of the STCW Convention

Dear Mr. Spackman:

This is to confirm that as administrators for both the Liberian and Marshall Islands registries, our view is that non-self-propelled vessels fall outside the scope of the 1978 STCW Convention, Amended 1995. This is based on IMO Resolution A.538(13), paragraph 2.4.1 which states that seafarers on board **self-propelled mobile offshore units** should meet the requirements of the STCW Convention, 1978.

Sincerely yours,



Captain James R. Norman
Chief, Merchant Marine Officer Division

VANUATU MARITIME SERVICES LTD

90 WASHINGTON STREET, 22ND FLOOR

NEW YORK, NEW YORK 10006

TELEPHONE: 212-425-9600
FACSIMILE: 212-425-9655
TELEX: 229346 VAN MAR SVC.

November 21, 1996

MR. ALAN SPACKMAN
DIRECTOR, OFFSHORE TECHNICAL AND
REGULATORY AFFAIRS
INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS
P.O. BOX 4287
HOUSTON, TX 77210-4287

Dear Mr. Spackman,

RE: APPLICABILITY OF THE STCW CONVENTION

I refer to your letter dated November 18, 1996 on the above subject.

Our interpretation of the STCW requirements is the same as that of the US Coast Guard relative to non-self propelled MODUs.

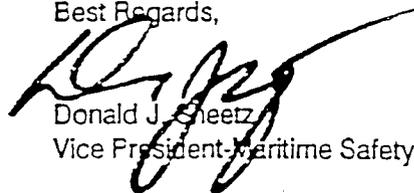
However, it has been a practice within the Vanuatu fleet to require that owners assign personnel aboard non-self propelled MODUs to be responsible for the operation of the survival craft -- lifeboats, liferafts, rescue boats, etc. These maritime personnel will be required to have the appropriate certification as ABs/Lifeboatmen.

All vessels in the fleet, whether self propelled or not, are issued Minimum Safe Manning Certificates. Currently these MSMCs require at least one certificated AB/Lifeboatman for every 2 survival craft on non-self propelled, but manned, vessels. We also require owners to assign one designated person in charge, be he a master, offshore installation manager, etc.; and, where radio communications equipment has been installed, and a radio station license has been issued, at least 1 (or 2, depending on the vessel) personnel with radiotelephone operator's licenses.

I trust that this answers your question.

On a different subject I will be in Houston for the next Navigation Safety Advisory Council meeting December 14 - 16, 1996. I am vice-chairman of that Coast Guard sponsored organization. I would like to meet with you and Alan Gustin on December 13, 1996 at your convenience. I will be calling next week to discuss.

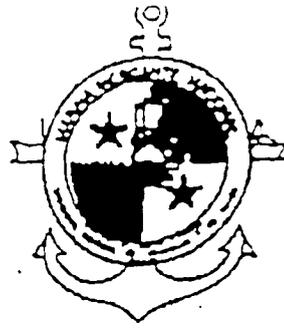
Best Regards,



Donald J. Sheetz
Vice President-Maritime Safety

CC: Mr. Alan Gustin: See the last paragraph. Are you available?
Marine Drilling Companies
One Sugar Creek Center Blvd, Suite 600
Sugar Land, Texas 77479-3556

DIRECTORATE OF
CONSULAR AND MARITIME AFFAIRS
NEW YORK REPRESENTATIVE OFFICE
REPUBLIC OF PANAMA
8 WEST 48th STREET - 10th FLOOR
NEW YORK, NEW YORK 10036 U.S.A.



DATE 11 December 1996

No. of Pages 1.

TO : Mr. Alan Speckman
Director, Offshore Technical and Regulatory Affairs, IADC

C.C. : Mr. Richard E. Haas, ROWAN Companies
Chairman, Panama Offshore Industry Advisory Committee

FROM : CAPT. A.E. FLORE, Chief of Maritime Safety

SUBJ. : Applicability of the STCW Convention

REF. : YOUR REF:

This is to confirm that this Administration considers that the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended in 1995 does not apply to non-self-propelled vessels, hence, to non-self-propelled drilling rigs as well. The basis for this adopted policy by Panama is IMO Resolution A.538(13), paragraph 2.4.1 of the APPENDIX to subject Resolution which states that seafarers on board self-propelled mobile offshore units should meet the requirements of the STCW Convention, 1978.

Please notify all concerned parties accordingly.

Regards



TEL: (212) 869-6440 • FAX: (212) 575-2285 (212) 575-2288 • R.C.A: 238185-DMSRP, 276663-DMSRP